

October 18, 2019

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MEMO ENDORSED



Given these circumstances, we respectfully request the following extensions of dates of the Scheduling Order:

Par. 3.c: The parties will complete depositions on or before **January 15, 2020** (an extension from December 2, 2019)

Par. 3.d: All non-expert discovery shall be completed by **January 15, 2020** (an extension from December 2, 2019)

Par. 3.e: All disclosures of the identities in reports of experts required by Rule 26(a)(2) shall be made no later than **February 15, 2020** (an extension from January 3, 2020). Any rebuttal report is due by **March 15, 2020** (an extension from January 31, 2020). The depositions of experts shall be completed no later than **April 15, 2020** (an extension from February 28, 2020).

Par. 3.f: Pre-trial motions, if any, will be filed no later than **May 15, 2020** (an extension from March 27, 2020). If no such motions are contemplated, the parties will submit a joint pre-trial order in accordance with procedures of the Judge before whom the trial will be conducted no later than **May 15, 2020** (an extension from March 27, 2020).

There have been no previous requests for time extensions under the Scheduling Order. Plaintiff's counsel has indicated that Plaintiff will not oppose this application.

If the court has any questions with respect to this request, I would be happy to address them. I appreciate the court's courtesy and attention to this matter.

USDC SDNY
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DOC #: _____
DATE FILED: <u>10/18/19</u>

cc: Maurice Heller (via e-mail)

Very truly yours,

A handwritten signature in black ink, appearing to read "CM".

Christopher Massaroni
(CM-1021)

SO ORDERED: DATE: 10/18/19
GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE